



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5

77 WEST JACKSON BOULEVARD  
CHICAGO, IL 60604-3590

February 4, 2013

REPLY TO THE ATTENTION OF:

Ms. Erin Rednour  
Remedial Project Manager  
Illinois Environmental Protection Agency  
1021 North Grand Avenue East  
P.O. Box 19276, MC -24  
Springfield, Illinois 62794-9276

Re: Comments on Closure Reports for Multiple Work Plans for the Chemetco Site,  
Hartford, Illinois

Dear Ms. Rednour:

Last month, the U.S. Environmental Protection Agency received copies of closure summary reports from the Estate of Chemetco for multiple work plans. We received a copy of the draft revisions to the Demolition Closeout Report on November 15, 2012. Illinois Environmental Protection Agency approved these plans pursuant to its Interim Order [Civil Case No. 00-cv-670-DRH, 00-cv-677-DRH (consolidated)]. Thank you for this opportunity to comment on the close out summaries for the Caustic Tank Work Plan, the Cupro Work Plan, the Demolition Closeout Report, the Pot Slag Work Plan, and the Scrubber Sludge Work Plan. The relatively minor comments below are for your consideration.

Caustic Tank Work Plan

No further comments.

Cupro Work Plan

1. Table 1 could be improved by noting to whom the material was shipped.
2. The closeout package could be improved by including a copy of the bankruptcy court's approval of the sales.
3. The closeout package could be improved by including any analytical data the Estate possesses on the pot slag (besides what is in work plan text), as well as the Material Safety Data Sheet.
4. The closeout package could be improved by noting where the cupro was located at the facility (stockpiles).

Demolition Closeout Report

Regarding comments 1-5, 7, 8 on the Demolition Closeout Report (DCR), please include these responses (text, tables, analytical results, etc.) in the text of the DCR.

#### Pot Slag Work Plan

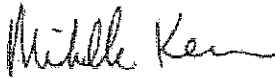
1. Table 1 could be improved by noting to whom the material was shipped.
2. The closeout package could be improved by including a copy of the bankruptcy court's approval of the sales.
3. The closeout package could be improved by including any analytical data the Estate possesses on the pot slag (besides what is in work plan text), as well as the Material Safety Data Sheet.

#### Scrubber Sludge Work Plan

1. Table 1 could be improved by noting to whom the material was shipped.
2. The closeout package could be improved by including a copy of the bankruptcy court's approval of the sales.
3. As I recall, there were changes to the loading procedures and the buyers during the course of completing this work. The text could be improved by being more descriptive about the progress of the work, issues, events, etc.
4. The closeout package could be improved by noting where the scrubber sludge was located at the facility.

These plans represent a significant amount of work by the Trustee and Paradigm Minerals & Environmental Services to liquidate Estate assets, and that appears to have improved the site. Their work and IEPA's, to oversee and facilitate, is notable. I look forward to the closeout and completion of these work plans. Of course, do not hesitate to contact me with questions about any of these comments.

Sincerely,



Michelle Kerr  
Remedial Project Manager  
Region 5 Superfund Division

cc: Chris Cahnovsky, IEPA